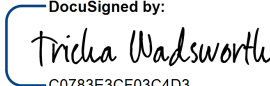


Exhibit B

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div> AMENDED 438-2022-01196 </div> </div>	
Virginia Office of Civil Rights _____ and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.)		Home Phone (Incl. Area Code)	Date of Birth
Tricha Wadsworth		540-823-0086	October 6, 1984
Street Address		City, State and ZIP Code	
13 Shenandoah Commons Way, Apt. 202		Front Royal, VA, 22630	
		Email Address	
		Awesomepursuit@gmail.com	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name		No. Employees, Members	Phone No. (Include Area Code)
Universal Protection Service, LLC d/b/a Allied Universal Security Services- Alexandria Branch		15+	(703) 998-5740
Street Address		City, State and ZIP Code	
2034 Eisenhower Avenue, Suite 140		Alexandria, VA, 22314	
		Email Address	
Name		No. Employees, Members	Phone No. (Include Area Code)
G4S Secure Solutions (USA) Inc.		15+	(561) 622-5656
Street Address		City, State and ZIP Code	
1395 University Boulevard		Jupiter, FL 33458-5289	
		Email Address	
DISCRIMINATION BASED ON (Check appropriate box(es).)		DATE(S) DISCRIMINATION TOOK PLACE	
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		Earliest Latest May 24, 2021 Nov 15, 2021 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):			
See Attachment A. I am represented by counsel in this matter. All correspondence should be directed to my attorney, Ivey E. Best, Esq., at The Spiggle Law Firm, P.C., 3601 Eisenhower Ave., Suite 425, Alexandria, VA 22304, ibest@spigglelaw.com.			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
<div style="display: flex; justify-content: space-between;"> <div> 3/27/2023 _____ Date </div> <div> DocuSigned by:  C0783E3CE03CAD3 _____ Charging Party Signature </div> </div>		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

ATTACHMENT "A"

Ms. Wadsworth began working at the Company on May 17th, 2021, as a Security Guard and was unlawfully terminated on November 15, 2021, while in the middle of being trained for a Sergeant position. Her starting and ending pay was \$16.50/hr.¹

Ms. Wadsworth had paid for her own armed security guard training which included CPR, Defib, and First-Aid training. Ms. Wadsworth always arrived to work at least 30 minutes before her shift began and at one point was working 72 or more hours per week. She was extremely organized and able to hold down a Post alone without supervision. Additionally, she successfully stopped numerous employee thefts in her short tenure with the Company.

Ms. Wadsworth was responsible for logging incoming and outgoing pick-up and deliveries, granting access badges and checking credentials. She also inspected all incoming and outgoing vehicles as well as personnel, answered phones, completed SOR reports, and participated in Command Center preparedness for any accidents and/or emergencies. She was also responsible for communicating with warehouse personnel, and communicating with/assisting any first responders regarding accidents on site.

Almost immediately upon beginning at the Company, Ms. Wadsworth was barraged by a litany of sexually harassing comments from her supervisors, Sgt. Preston Free and Lt. Will Roseboro. For example, Sgt. Free would make comments to Ms. Wadsworth daily about her appearance (e.g., sexually provocative comments), and make sexual innuendos regarding Ms. Wadsworth sexual preference (whether she had a boyfriend/girlfriend), and asked her sexually charged questions such as whether or not she enjoyed using whip cream and chocolate syrup during sex. Sgt. Roseboro would repeatedly harass Ms. Wadsworth by saying "looking good future wife" (the nickname he began calling her) and would comment on her body and appearance.

On July 26th 2021, Ms. Wadsworth approached Lt. Roseboro regarding a medical procedure she needed done. Lt. Roseboro told her he would need to see the paperwork proving she was having surgery. The procedure was breast reduction to relieve her back pain. Lt. Roseboro proceeded to lament, asking her "why on earth" would she get such a procedure done, how she would "make a lot of men unhappy" by doing the procedure, and that he didn't want his "future wife" to get that done. This sickening barrage of sexually charged commentary went on for a full week. Lt. Roseboro even told Ms. Wadsworth that he had watched a video of the procedure at home and then began

¹ Ms. Wadsworth had been told by Lt. Will Roseboro, during an in-person interview held on May 6, 2021 at 09:00 on Site (Axalta), that after 30 days, she would receive a \$1.00/hr. increase and that by November 2021, she would max out at \$18.50/hr. The raise did not occur for anyone as the Company was acquired by Allied Universal.

commenting on the procedure itself. At that point, he had clearly discussed Ms. Wadsworth's medical procedure with Sgt. Free, and when Lt. Roseboro left his Post at 3:00PM and Sgt. Free took over, Sgt. Free also began commenting daily on Ms. Wadsworth's procedure and her breast size. He shockingly told her that he loved her breast size and that a lot of women would be jealous and want to have that. Both Lt. Roseboro and Sgt. Free stated directly to Ms. Wadsworth on multiple occasions that they were both "ass and tits guys."

In June 2021, the sexual innuendos became more aggressive from Sgt. Free. He would ask Ms. Wadsworth how many times per week she liked to have sex and whether she liked White or Black men. Sgt. Free then began involving the truck drivers who would come on-site in his harassment of Ms. Wadsworth. He offered Ms. Wadsworth's phone number to the truck drivers so they could "meet her after work and she could make some more money."² It was around this time that Lt. Roseboro began only addressing Ms. Wadsworth as his "future wife." Additionally, Sgt. Free received multiple phone numbers from various drivers, wrote them down, and handed them to Ms. Wadsworth, as well as gave out Ms. Wadsworth's personal email address to the drivers.

On June 14, 2021, Lt. Roseboro brought in some nuts from Africa and stored it in the refrigerator. He told everyone it is used to "arouse men and make them horny." Lt. Roseboro told Ms. Wadsworth that the nut was for her and asked her if she wanted to take some home and "take them for a spin." He also said that it was time for her to "try out his dark chocolate." Lt. Roseboro is Black. He also told Ms. Wadsworth in front of Sgt. Free that he and his wife were "swingers" and went into graphic detail about their escapades. This included him stating that he was getting paid for White women to complete their interracial fantasies and that his wife did not mind was looking forward to a "threesome."

Not a day went by that Ms. Wadsworth was not subjected to some type of sexual harassment at the hands of Sgt. Free and Lt. Roseboro. After a while, Lt. Roseboro began to stay on Post past his shift. Just as with Sgt. Free, Lt. Roseboro's comments became more and more sexually explicit and he began telling Ms. Wadsworth about what kind of porn he liked to watch and tried to engage Ms. Wadsworth to discuss her preferences. Ms. Wadsworth told him numerous times that the conversations were making her feel uncomfortable and she really wanted them to stop. Every time Ms. Wadsworth asked Sgt. Roseboro to please stop talking to her in inappropriate and abusive ways or she was going to go to Human Resources, he would tell her that there had been plenty of girls before Ms. Wadsworth, and they were no longer employed with the Company. He stated, "we have our ways and I promise you it will backfire on you and you will lose your job, do you want that?"

² One on occasion, Sgt. Free "jokingly" suggested Ms. Wadsworth get in the cab of the truck with a driver. Sgt. Free discussed graphically the size of this driver's genitals and told Ms. Wadsworth she "wouldn't feel a thing." He told her to "take one for the team."

October 7, 2021 was Ms. Wadsworth's last day on Post prior to her surgery. Both Sgt. Free and Lt. Roseboro began harassing her almost immediately and lamenting that this was the last time they would "be blessed" with her "bigger breasts." At one point during her shift, Lt. Roseboro was standing next to Ms. Wadsworth and placed his hand on her shoulder. He was again attempting to talk her out of her surgery and was commenting on her body and what a shame it would be to get the surgery done. Ms. Wadsworth tried to step away and voiced her discomfort when his hand slid down her shoulder and down the small of her back. Understandably, at this point, Ms. Wadsworth became extremely agitated and told Lt. Roseboro that she had repeatedly told him that these types of conversations made her feel extremely uncomfortable and that she was just there to do her job and he was making it impossible for her to do that. It should be noted here that Ms. Wadsworth had been sexually abused as a child and therefore, this type of sexually abusive behavior from her superior was causing her to experience flashbacks. Ms. Wadsworth told Lt. Roseboro and Sgt. Free she was going outside to call HR. Both Lt. Roseboro and Sgt. Free commenced yelling at Ms. Wadsworth and threatening her that if she called HR, she would be terminated.

Lt. Roseboro and Sgt. Free's actions made Ms. Wadsworth so uncomfortable and terrified that she spilled her coffee all over the desk and hurriedly tried to clean it up, all while she was trembling and shaking because she felt the urge to get to safety. Sgt Free then yelled at Ms. Wadsworth as she attempted to clean up the coffee, yelling: "Tricha, you don't want to do this, we've talked about this, there has been other girls in your shoes and look around - they are not here, if you do this we will find a way and you will be terminated!" Ms. Wadsworth then stated "I haven't done anything, I have to deal with this every day and I still do my job better than anyone here. What are you going to do Blackmail me?" Sgt. Free then replied: "Try us."

Ms. Wadsworth first tried to contact Amir Day, the regional site supervisor, but was unsuccessful. She then tried to reach Taylor Sanders, HR generalist, three (3) times with no response. Lt. Roseboro came out and began yelling at Ms. Wadsworth again. She went to her car and emailed Ms. Sanders, requesting a call. By the time Ms. Wadsworth got home (15 minutes after her email), Ms. Sanders had called Ms. Wadsworth and told her not to worry about it, to have her surgery, and that when she was feeling better, to email her statement to David Holden, Director of Operations, so an investigation into Ms. Wadsworth's allegations of sexual harassment could begin. On October 22, 2021, Ms. Wadsworth emailed Mr. Holden regarding all of the sexual harassment she had endured since starting at the Company. On that same date, Ms. Wadsworth received a response from Mr. Holden, assuring her that an investigation would commence and that she had not lost her job. Importantly, Amir Day and Lt. Roseboro are close friends that have known each other for a long time.

However, on November 12, 2021, at the end of her FMLA leave for her surgery, Ms. Wadsworth was instructed to drive to the Reston, VA location to

meet with Mr. Day. Mr. Day informed Ms. Wadsworth she was being removed from her Post and told that the reason was a “client request.” Ms. Wadsworth asked if she was being removed because she had filed a sexual harassment complaint to which Mr. Day would not respond. Ms. Wadsworth pressed on and asked who exactly had asked that she be removed and was told it was another employee that was above Lt. Roseboro and who was also friends with Lt. Roseboro.

Ms. Wadsworth was callously and illegally terminated three (3) weeks after reporting sexual harassment at the hands of her superior. No investigation was conducted and, in fact, she was told repeatedly in emails by Mr. Holden that her job was secure and they were working on getting her back on the schedule. Ms. Wadsworth has not been able to obtain another job and is struggling financially to support her two daughters with no income. Further, as a result of the mental anguish and trauma these incidents have caused, Ms. Wadsworth’s doctor has recommended that she not pursue her armed security career. Ms. Wadsworth has also needed to seek treatment for sleep disruption, depression, and severe anxiety and distress.

Lastly, it should be noted that there are several individuals who witnessed Lt. Roseboro and Sgt. Free’s sexual harassment of Ms. Wadsworth. Attached to this correspondence is the declaration of one such individual. **See Exhibit A.** These individuals are ready to come forward and testify should this matter proceed to litigation.

Exhibit A

DECLARATION OF JOHN DOE

1. My name is John Doe. I declare under penalty of perjury that the following is true and correct. 28 U.S.C. § 1746.

2. I have known Tricha Wadsworth for four (4) years and during that time, because of my profession, I interacted with her and others at her job site at G4S/Allied Universal two to three times per week.

3. I observed Sgt. Preston Free and Lt. Will Roseboro sexually harass Ms. Wadsworth on at least four or five different occasions.

4. On September 22, 2021, I heard Lt. Roseboro say to Ms. Wadsworth, "why don't you come into the bathroom and I can put whip cream on my cock and you can lick it off." He then said to her, "you know you like this."

5. On May 19, 2021, I heard Sgt. Free say to Ms. Wadsworth, "Oh you know you want this," (referring to his body) and, "you can't handle this."

6. When Sgt. Free and Lt. Roseboro would say these things to Ms. Wadsworth, she just sat there and took it, but I could always tell by her face that she was hurt by it.

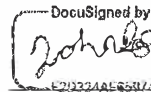
7. On multiple occasions (August 4 and 18, 2021, and September 29, 2021), I had a full view of both Lt. Roseboro who was sitting at his desk, and Ms. Wadsworth who was on the other side of the room checking in trucks. From where she was, Ms. Wadsworth could not see what Lt. Roseboro was doing. From my vantage point, I was able to observe Lt. Roseboro rubbing his crotch under his desk while looking at Ms. Wadsworth. When Ms. Wadsworth looked over at him, Lt. Roseboro would stop and chuckle.

8. Prior to Ms. Wadsworth, there had been at least one other female security guard that I observed being sexually harassed by Sgt. Free and Lt. Roseboro – she no longer works there.

9. I have observed Sgt. Free and Lt. Roseboro treat many of the security guards very badly. If a security guard was not part of the “clique,” which Ms. Wadsworth was not, they would get harassed by Sgt. Free and Lt. Roseboro.

4/4/2022

Date

DocuSigned by:

E29324AE6587457

John Doe